

# Frankfurt Kurnit Klein + Selz PC

Edward H. Rosenthal  
28 Liberty Street  
New York, New York 10005  
T (212) 826-5524  
F (212) 593-9175  
erosenthal@fkks.com

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## VIA ECF

The Hon. Ronnie Abrams  
United States District Court  
for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Diamond Hands Consulting Ltd. v. Bongers et al. Case No. 1-21-cv-11223*  
(RA) (SN)

Dear Judge Abrams,

We represent the defendants Kyle Bongers and Hurley Blake Starling (collectively referred to herein as the “Defendants”) in the above-captioned action.

We write pursuant to Rule 1(D) of Your Honor’s Individual Rules & Practices in Civil Cases to request a one-week extension of time to file a motion for reconsideration or reargument of the Court’s July 20, 2022 Order granting a preliminary injunction against Defendants (the “July 20 Order”), with a corresponding one-week extension of time for Plaintiff Diamond Hands Consulting Ltd (“DHC”) to file any opposition to such a motion.

Under Local Civil Rule 6.3, the time for Defendants to file a motion for reconsideration or reargument of the July 20 Order is August 3, 2022. Defendants have not previously requested an adjournment or extension of time to file such a motion. Defendants have conferred with DHC, and DHC consents to the requested one-week extension of time to file the motion, provided that DHC receives a corresponding one-week extension of time to oppose the motion.

Accordingly, Defendants respectfully request that the Court extend Defendants’ time to file a motion for reconsideration or reargument of the July 20 Order to August 10, 2022 and DHC’s time to file an opposition to such a motion to August 31, 2022.

The Parties have agreed that this extension and the anticipated motion for reconsideration should not impact or delay the Court's consideration of Plaintiff's pending application for contempt against Defendants, nor should it be construed as a waiver of Defendants' contention that they are in full compliance with the preliminary injunction order.

Respectfully Submitted,

*/s/ Edward H. Rosenthal*

Edward. H. Rosenthal

cc: All counsel (via ECF)

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'RA', with a long horizontal stroke extending to the right.

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Hon. Ronnie Abrams

08/01/2022